

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of)	
)	
Administration of the)	CC Docket No. 99-200
North American Numbering Plan)	
)	

REPLY COMMENTS OF CAVALIER TELEPHONE, LLC

Pursuant to the Commission's March 11, 2005 Public Notice in this docket, Cavalier Telephone, LLC ("Cavalier") submits the following comments on the petitions of RNK, Inc. d/b/a RNK Telecom, Nuvio Corporation, Unipoint Enhanced Services d/b/a PointOne, Dialpad Communications, Inc., Vonage Holdings Corporation, and VoEX, Inc.

Like the Maine Public Utilities Commission, Cavalier does not seek to impede the development of emerging technologies. However, like the Maine PUC, Cavalier has concerns with the potential problems that could accompany a grant of the VoIP providers' waiver petitions by this Commission.

Specifically, Cavalier is concerned with the ability of customers to maintain the portability of their numbers. Cavalier has had problems on several occasions with VoIP providers who did not wish to port a customer's number. In fact, Cavalier recently encountered problems porting lines for several customers who wished to switch their services from one of the VoIP providers seeking a waiver in this docket. Eventually, Cavalier was able to arrange for the numbers to be ported, but only after telephone calls to outside counsel and a carrier relations manager. However, these types of problems needlessly impede customers' freedom of choice and add needless burden and expense to the work of individuals in commerce and government.

For this reason, Cavalier respectfully requests that the Commission explicitly condition any waiver in this docket upon compliance with the number portability procedures that apply to local exchange carriers.

Respectfully submitted,

CAVALIER TELEPHONE, LLC

A handwritten signature in black ink, appearing to read "Stephen T. Perkins". The signature is fluid and cursive, with a large initial "S" and a distinct "P".

Stephen T. Perkins
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